CLAIM 1

Claim 1 recites a data storage apparatus that requires:

"an interface configured to receive digital data; and
a data processor communicatively coupled to the interface and being configured to:
    automatically receive digital data from the interface and cause the digital data
        to be stored to a write-once-read-many (WORM) storage device,
    process a search query against the digital data stored on the WORM storage
        device, and
    in response to processing the search query against the digital data stored on the
        WORM storage device, generate data that identifies data stored on the
        WORM storage device that satisfies the search query."

It is well founded that in order to establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. See MPEP 2143.03. It is respectfully submitted that, as stated in previous responses by Applicant, *Ramsay* and *Moon*, taken alone or in combination, do not teach or suggest a data processor configured to both "process a search query against the digital data stored on the WORM storage device" and "in response to processing the search query against the digital data stored on the WORM storage device, generate data that identifies data stored on the WORM storage device that satisfies the search query" as required by Claim 1.

The prior Office Actions expressly stated that *Ramsay* does not teach or suggest the Claim 1 limitation of "process a search query against the digital data stored on the WORM storage device," and asserted that this limitation is taught by *Moon* at Col. 1, lines 17-23. The text at this portion of *Moon* describes an approach for reducing the time required to search packet data stored on a recording medium by generating additional information that is used during the search process. Although this text describes searching digital data stored on a recording medium and a recording and/or playback apparatus, there is no mention or suggestion of a write-once read many (WORM) storage device. Other portions of *Moon* describe recording media, such as optical discs.

As described herein, however, optical discs are not necessarily WORM devices, given the wide availability and commonplace use of rewritable CDs and DVDs. It is therefore respectfully submitted that *Moon* does not teach or suggest a data storage apparatus with a data processor configured to "process a search query against the digital data stored on the WORM storage device," as is required by Claim 1.

It is further respectfully submitted, as stated in previous response by Applicant, that *Moon* does not in any way teach or suggest that the data processor is also configured to "in response to processing the search query against the digital data stored on the WORM storage device, generate data that identifies data stored on the WORM storage device that satisfies the search query," as is required by Claim 1. The previous Office Action asserts this limitation is taught by *Moon* at Col. 3, lines 60-65. The text at this portion of *Moon* describes generating basic unit information that includes arrival time information for packet data, specifically, the arrival time of a first packet of data in a basic unit. The basic unit information is stored on recording medium separate from the packet data and is used to reduce the amount of time required to search the packet data stored on the recording medium. Thus, *Moon* arguably teaches storing basic unit information data on the recording medium that assists in processing search queries against data stored on the recording medium. There is no mention or suggestion, however, of in response to processing a search query against the data stored on the recording medium, generating and storing data on the recording medium that identifies data stored on the recording medium that satisfies a search query.

Furthermore, as described previously, even if *Moon* did teach or suggest generating and storing data on the recording medium that identifies data stored on the recording medium that satisfies a search query, there is no teaching or suggestion in *Moon* of performing this step in the context of a WORM device. It is therefore respectfully submitted that the Claim 1 limitation of

"in response to processing the search query against the digital data stored on the WORM storage device, generate data that identifies data stored on the WORM storage device that satisfies the search query" is also not taught or suggested by *Moon.*

In view of the foregoing, it is respectfully submitted that Claim 1 includes one or more limitations that are not in any way taught or suggested by *Ramsay* and *Moon*, taken alone or in combination, and that Claim 1 is therefore patentable over *Ramsay* and *Moon.*

CLAIMS 2-3 AND 8-11

Claims 2-3 and 8-11 all depend from Claim 1 and include all of the limitations of Claim 1. It is therefore respectfully submitted that Claims 2-3 and 8-11 are patentable over *Ramsay* and *Moon* for at least the reasons set forth herein with respect to Claim 1. Furthermore, it is respectfully submitted that Claims 2-3 and 8-11 recite additional limitations that independently render them patentable over *Ramsay* and *Moon.*

For example Claim 3 also requires that "the data processor is further configured to generate one or more indexes for data storage to the WORM storage device." The final Office Action asserted that this limitation is taught by *Kern* at Col. 22, lines 18-23 and Col. 30, lines 58-59. Since the *Kern* reference is not relied upon for this rejection and since neither the *Kern* reference nor the *Moon* reference have 22 columns of text, it is presumed that the Office Action meant to refer to the *Ramsay* reference. The text at Col. 22, lines 18-23 of *Ramsay* does not mention indexes. The text at Col. 30, lines 58-59 of *Ramsay* briefly mentions an index in the context of database 84 recording an accession number, index, or address for an initial frame and size associated with a specific document to permit cataloging and retrieval of the document. There is no mention or suggestion, however, of generating one or more indexes for data stored on a WORM storage device. It is therefore respectfully submitted that the additional limitations

required by Claim 3, namely, "the data processor is further configured to generate one or more indexes for data stored to the WORM storage device," are not taught or suggested by *Moon* and *Ramsay*, taken alone or in combination.

CLAIMS 12-13 AND 18-21

Claims 12-13 and 18-21 include limitations similar to Claims 1, 3, 4 and 6-11, except in the context of a method for storing data. It is therefore respectfully submitted that Claims 12-13 and 18-21 are patentable over *Ramsay* and *Moon* for at least the reasons set forth herein with respect to Claims 1, 3, 4 and 6-11.

CLAIMS 22-23 AND 28-31

Claims 22-23 and 28-31 include limitations similar to Claims 1, 3, 4 and 6-11, except in the context of computer-readable media for storing data. It is therefore respectfully submitted that Claims 22-23 and 28-31 are patentable over *Ramsay* and *Moon* for at least the reasons set forth herein with respect to Claims 1, 3, 4 and 6-11.

In view of the foregoing, it is respectfully submitted that Claims 1-3, 8-13, 18-23 and 28-31 are patentable over *Ramsay* and *Moon*, taken alone or in combination, since each of these Claims include one or more limitations that are not in any way taught or suggested by *Ramsay* and *Moon*. Accordingly, reconsideration and withdrawal of the rejection of Claims 1-3, 8-13, 18-23 and 28-31 under 35 U.S.C. § 103(a) as being unpatentable over *Ramsay* in view of *Moon* is respectfully requested.

4.   REJECTION OF CLAIMS 4, 6, 7, 14, 16, 17, 24, 26 AND 27 UNDER U.S.C. §
103(a)

Claims 4, 6-7, 14, 16-17, 24, 26 and 27 were rejected under 35 U.S.C. § 103(a) as being

anticipated by *Ramsey* in view of *Moon* and in further view of *Kern*. It is respectfully submitted

that Claims 4, 6-7, 14, 16-17, 24, 26 and 27, are patentable over *Ramsey*, *Moon* and *Kern* for at

least the reason provided hereinafter.

CLAIMS 4, 6 AND 7

Claims 4, 6 and 7 all depend from Claim 1 and include all of the limitations of Claim 1.

As set forth herein with respect to Claim 1, *Ramsay* and *Moon* do not teach or suggest one or

more limitations required by Claim 1. It is also respectfully submitted that these limitations are

not taught or suggested by *Kern*. For example, it is respectfully submitted that *Kern* does not

teach or suggest that the data processor is also configured to "in response to processing the search

query against the digital data stored on the WORM storage device, generate data that identifies

data stored on the WORM storage device that satisfies the search query," as is required by Claims

4, 6 and 7. *Kern* does not teach or suggest processing search queries against digital data stored on

a WORM storage device. *Kern* also does not in any way teach or suggest generating "data that

identifies data stored on the WORM storage device that satisfies the search query," as is required

by Claims 4, 6 and 7. There is absolutely no mention or suggestion in *Kern* of "in response to

processing the search query against the digital data stored on the WORM storage device, generate

data that identifies data stored on the WORM storage device that satisfies the search query," as is

required by Claims 4, 6 and 7. It is therefore respectfully submitted that Claims 4, 6 and 7 are

patentable over *Ramsay, Moon* and *Kern*.

CLAIMS 14, 16 AND 17

Claims 14, 16 and 17 recite limitations similar to Claims 4, 6 and 7, except in the context of method claims. It is therefore respectfully submitted that Claims 14, 16 and 17 are patentable over *Ramsay*, *Moon* and *Kern* for at least the reasons set forth herein with respect to Claims 4, 6 and 7.

CLAIMS 24, 26 AND 27

Claims 24, 26 and 27 recite limitations similar to Claims 4, 6 and 7, except in the context of method claims. It is therefore respectfully submitted that Claims 24, 26 and 27 are patentable over *Ramsay*, *Moon* and *Kern* for at least the reasons set forth herein with respect to Claims 4, 6 and 7.

In view of the foregoing, it is respectfully submitted that Claims 4, 6-7, 14, 16-17, 24, 26 and 27 are patentable over *Ramsay, Moon* and *Kern* since each of these claims include one or more limitations that are not in any way taught or suggested by *Ramsay, Moon* and *Kern*, taken alone or in combination. Accordingly, reconsideration and withdrawal of the rejection of Claims 4, 6-7, 14, 16-17, 24, 26 and 27 under 35 U.S.C. § 103(a) as being unpatentable over *Ramsay* in view of *Moon* and further in view of *Kern* is respectfully requested.

It is respectfully submitted that all of the pending Claims are in condition for allowance and the issuance of a notice of allowance is respectfully requested. If there are any additional charges, please charge them to Deposit Account No. 50-1302.

The Examiner is invited to contact the undersigned by telephone if the Examiner believes that such contact would be helpful in furthering the prosecution of this application.

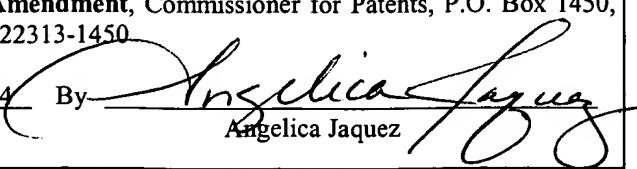Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP
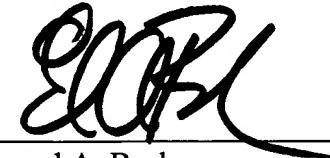
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